

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

JAMES HOFT and TGP COMMUNICATIONS,	)	
LLC, d/b/a/ The Gateway Pundit,	)	
	)	
Plaintiffs,	)	
	)	CASE NO.: 4:24-CV-01304-HEA
v.	)	
	)	
WILLIAM CHARLES BUNDREN and	)	
BUNDREN LAW GROUP, PLLC,	)	
	)	
Defendants.	)	

**MOTION FOR LEAVE TO FILE SUR-REPLY  
TO PLAINTIFFS’ REPLY TO DEFENDANTS’ MEMORANDUM OF LAW IN  
RESPONSE TO PLAINTIFFS’ MOTION FOR TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

COME NOW William Charles Bundren (“Bundren”) and Bundren Law Group, PLLC (“BLG”) (collectively, “Defendants”), by and through counsel, pursuant to E.D. Mo. L.R. 4.01(C), and for their Motion for Leave to file a Sur-Reply to Plaintiffs’ Reply (Doc. 24) to Defendants’ Memorandum of Law in Response to Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction (Doc. 21), state as follows:

1. Pursuant to Local Rule 4.01(C), additional memoranda may be filed only with leave of Court.
2. Defendants move for leave to file a sur-reply to address and distinguish the arguments and authorities relied on and misconstrued by Plaintiffs in their fifteen (15) page Reply (Doc. 24) where they introduce new facts, testimony, and arguments to assert that this Court has “concurrent jurisdiction” over Defendants and that the “first-filed rule” discussed in *Northwest Airlines v. American Airlines*, 989 F.2d at 1002 (8th Cir. 1993) applies to this suit.

3. Defendants are seeking leave from this Court to file the proposed Sur-Reply to Plaintiffs' Reply to Defendants' Memorandum of Law in Response to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction, which is attached hereto as **Exhibit "A"**.

4. Defendants do not seek leave to delay these proceedings or burden this Court with additional memoranda that duplicates, or re-asserts, arguments previously asserted.

WHEREFORE, William Charles Bundren and Bundren Law Group, PLLC respectfully request that this Court enter an Order granting Defendants' Motion for Leave to file Sur-Reply to Plaintiffs' Reply (Doc. 24) to Defendants' Memorandum of Law in Response to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (Doc. 21) as filed into the record; and for such other and further relief as this Court deems appropriate.

Dated: November 11, 2024

Respectfully submitted,

JENKINS & KLING, P.C.

By: /s/ Liam R. Brannon  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 11, 2024, the foregoing was filed electronically to be served to all counsel of record by operation of the Court's electronic filing system.

/s/ Liam R. Brannon